

**From:** [Sheldrake, Sean](#)  
**To:** "BAYUK Dana"  
**Cc:** [DeMaria, Eva](#); [Chu Rebecca](#); "GREENFIELD Sarah"; "MCCLINCY Matt"; "Lance Peterson (PetersonLE@cdmsmith.com)"; [Scott Coffey](#)  
**Subject:** RE: Working Draft Gasco Pre-RD BOD Work Plan Comments (sf3)  
**Date:** Friday, September 29, 2017 1:29:00 PM  
**Attachments:** [RE Working Draft Gasco Pre-RD BOD Work Plan Comments \(sf2\).msg](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image015.png](#)

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Thanks very much Dana for DEQ's thorough review. We'll take a look and let you know if we have any questions or concerns.

You too.

S

Sean Sheldrake, Unit Diving Officer, RPM  
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**From:** BAYUK Dana [mailto:[dana.bayuk@state.or.us](mailto:dana.bayuk@state.or.us)]  
**Sent:** Friday, September 29, 2017 11:47 AM  
**To:** Sheldrake, Sean <[sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov)>  
**Cc:** DeMaria, Eva <[DeMaria.Eva@epa.gov](mailto:DeMaria.Eva@epa.gov)>; Chu Rebecca <[Chu.Rebecca@epa.gov](mailto:Chu.Rebecca@epa.gov)>; 'GREENFIELD Sarah' <[sarah.greenfield@state.or.us](mailto:sarah.greenfield@state.or.us)>; 'MCCLINCY Matt' <[matt.mcclincy@state.or.us](mailto:matt.mcclincy@state.or.us)>; 'Lance Peterson (PetersonLE@cdmsmith.com)' <[PetersonLE@cdmsmith.com](mailto:PetersonLE@cdmsmith.com)>; Scott Coffey <[coffeyse@cdmsmith.com](mailto:coffeyse@cdmsmith.com)>  
**Subject:** RE: Working Draft Gasco Pre-RD BOD Work Plan Comments (sf2)

Good morning Sean.

Attached is the red-line showing DEQ edits and comments to EPA's draft comments set on the work plan referenced above. The draft comments were attached to your September 20<sup>th</sup> e-mail (see below). The attachments represent DEQ's final comments on the Work Plan.

FYI...during our review we attempted to format our edits and comments consistent with the draft comments set. This resulted in our making the following changes throughout the document for

consistency.

- Italics are used where text is emphasized
- Quotation marks are used where text from documents is quoted or when referencing specific comments within the comments set.
- References made to comments in the set are cited by specifying the location within the Work Plan instead of the comment number. We did this because didn't know if the number and/or order of the comments might change in the final version. Here's an example:

For clarification, the riverbank is within the Interim Project Area (see comment to "Section 3.4 Riverbank, page 9").

Apologies if these changes add time to finalizing the comments set. This was not our intent.

Please note the following as you review our comments:

- It appears inconsistent references are made to use of the RALs and/or ROD Table 17 cleanup values. DEQ understands that in-water, RALs will be used to identify volumes of contaminated sediment for dredging, and Table 17 cleanup values will be used to evaluate the effectiveness of dredging and/or to monitor cap performance. Regarding the riverbank, our understanding is less clear. We request the comments clarify that Table 17 cleanup levels (and upland cleanup criteria for important COCs not on Table 17) be used to delineate the extent of riverbank contamination and areas of the riverbank requiring remediation.
- DEQ interprets the decision tree in Figure 28 of the ROD to require lateral and vertical delineation of sediment management areas (SMAs) based on the RALs established for the focused COCs. Comments requiring dredging to the vertical extent of the Table 17 cleanup levels appear to be inconsistent this approach. Suggest that comment clarify EPA's approach to lateral and vertical delineation of the SMAs.
- We understand that the proposed design performance standards for caps should align with the applicable points of compliance (POC) and development of a long-term performance monitoring program. DEQ suggests that EPA establish the appropriate point of compliance for caps in the Work Plan comments. DEQ has identified 30 cm as the key depth based on our understanding of EPA's intent to set the POC at 30 cm below the surface of the cap. Our edits reflect this understanding.
- DEQ added a reference to hot spots in the context of evaluating PTW on and below the riverbank. The reference is made to ensure that the state's interests are considered during evaluations of riverbank contamination and remediation.

Sean...everyone here appreciated the opportunity and the time to look at the draft comments set. It gave us a chance to reconsider and revise our draft comments, and to add important topics that we either had not included or needed to clarify.

Please feel free to let me know if you have questions, or want to arrange a call to discuss any aspects of the attachment.

Hope your day goes well and have a good weekend.

Dana

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**From:** BAYUK Dana  
**Sent:** Thursday, September 28, 2017 6:20 PM  
**To:** 'Sheldrake, Sean'  
**Cc:** DeMaria, Eva; Chu Rebecca; GREENFIELD Sarah; MCCLINCY Matt; Lance Peterson  
([PetersonLE@cdmsmith.com](mailto:PetersonLE@cdmsmith.com)); Scott Coffey  
**Subject:** RE: Working Draft Gasco Pre-RD BOD Work Plan Comments (sf2)

FYI Sean...wrapping up consolidation of our comments. Just going through the final version to check changes. Plan on sending the RLSO tomorrow morning.

Have a good evening.

Dana

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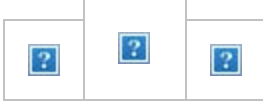
**From:** Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]  
**Sent:** Tuesday, September 19, 2017 2:23 PM  
**To:** BAYUK Dana  
**Cc:** DeMaria, Eva; Chu Rebecca; GREENFIELD Sarah; MCCLINCY Matt; Lance Peterson  
([PetersonLE@cdmsmith.com](mailto:PetersonLE@cdmsmith.com)); Scott Coffey  
**Subject:** RE: Working Draft Gasco Pre-RD BOD Work Plan Comments (sf2)

Thank you Dana, I think that works. As this is the first design set of comments going out, I really appreciate the extra effort to make sure we're all on the same page.

You too.

S

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**From:** BAYUK Dana [<mailto:dana.bayuk@state.or.us>]  
**Sent:** Tuesday, September 19, 2017 2:01 PM  
**To:** Sheldrake, Sean <[sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov)>  
**Cc:** DeMaria, Eva <[DeMaria.Eva@epa.gov](mailto:DeMaria.Eva@epa.gov)>; Chu Rebecca <[Chu.Rebecca@epa.gov](mailto:Chu.Rebecca@epa.gov)>; GREENFIELD Sarah <[sarah.greenfield@state.or.us](mailto:sarah.greenfield@state.or.us)>; MCCLINCY Matt <[matt.mcclincy@state.or.us](mailto:matt.mcclincy@state.or.us)>  
**Subject:** RE: Working Draft Gasco Pre-RD BOD Work Plan Comments (sf)

Afternoon Sean.

Received the draft comments on the Pre-RD BOD work plan and we're prioritizing them for review.

I've checked workloads here and it looks like we can get you our RLSO no later than end of day next Thursday (9/28). Let me know if that works for you.

Appreciate being able to look at the draft comments set and hope your day is going well.

Dana

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**From:** Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]  
**Sent:** Tuesday, September 19, 2017 1:11 PM  
**To:** MCCLINCY Matt; GREENFIELD Sarah; BAYUK Dana  
**Cc:** DeMaria, Eva; Chu Rebecca

**Subject:** FW: Working Draft Gasco Pre-RD BOD Work Plan Comments (sf)  
**Importance:** High

Hello Dana, Matt and Sarah,

As promised, here are the compiled final working draft comments on the Gasco pre-RD BOD work plan. Please make any edits in redline. If at all possible we would like to have suggested changes back in 5 business days. So that you don't miss it-relative to how RALs are applied- if you have specific wording notions on comment #43 that would also be particularly useful feedback.

Let me know if you have any questions —and see you next week.

Thank you.

S

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